

Message

From: Sivak, Michael [Sivak.Michael@epa.gov]
Sent: 10/4/2018 5:47:19 PM
To: Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Donovan, Betsy [Donovan.Betsy@epa.gov]; Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]
Subject: RE: Rolling Knolls - Appendix B to the Feasibility Study Report

I'm ok with the revised text from EPA – the one with the redline language.

Michael Sivak

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212.637.4310

From: Vaughn, Stephanie
Sent: Tuesday, October 2, 2018 10:54 AM
To: Sivak, Michael <Sivak.Michael@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Subject: RE: Rolling Knolls - Appendix B to the Feasibility Study Report

Okay, I'm circling back to this.

See my (new) notes in red, below.

Michael – do my edits to the introduction make sense? The ARSs are risk-based, right?

Thanks

From: Sivak, Michael
Sent: Friday, September 14, 2018 5:01 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Subject: RE: Rolling Knolls - Appendix B to the Feasibility Study Report

Here's my take on John P's comment on the paragraph on Page 3: He thinks it should stay because it shows that the soils beyond the Selected Area have an EPC below the ARS. However, isn't the main reason we asked for this to be removed is that NJDEP wasn't comfortable with Appendix B comparing the EPC to the ARS to demonstrate that no further work was needed? If so, then John's suggested edits don't address that NJDEP concern. And if we still believe that removing the text is the best way for NJDEP to have a level of comfort that Appendix B is solely for EPA to assess residual risk, then we should continue to push that the paragraph be deleted.

Michael Sivak

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From: Vaughn, Stephanie
Sent: Friday, September 14, 2018 3:56 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Sivak, Michael <Sivak.Michael@epa.gov>
Subject: RE: Rolling Knolls - Appendix B to the Feasibility Study Report

What do you think of the below edits in red....I think the rest is okay as is (i.e., as we sent it to them). But we can discuss with them on Monday.

Michael, any thoughts?

Thanks

From: Donovan, Betsy
Sent: Friday, September 14, 2018 12:36 PM
To: Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: FW: Rolling Knolls - Appendix B to the Feasibility Study Report

We need to discuss the following submittal amongst MPS before sending it out to Michael or NJDEP. I had shared our suggested language with NJDEP and they were okay with it. Please let me know if you are available for a call today? If not, please let me know when you might have time. Thanks.

From: John Persico [mailto:JPersico@Geosyntec.com]
Sent: Friday, September 14, 2018 8:50 AM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Cc: Michael Draikiwicz <mdraikiwicz@enviro-sciences.com>; Richard Ricci <rricci@lowenstein.com>; Gabala, Allison <AGabala@lowenstein.com>; mfaigen@issuesllc.com; Gary M. Fisher (gary.fisher@nokia.com) <gary.fisher@nokia.com>; alalonde@riker.com; Truedinger, Robb <robb.truedinger@novartis.com>; Goldfarb, Steven <steven.goldfarb@novartis.com>; Irvin M. Freilich <IFreilich@gibbonslaw.com>; Mirza-Reid, Sofina <sofina.mirza-reid@novartis.com>; kjolitz@chevron.com; Richard T. Hughes <rhughes@jw.com>; Seth Kellogg <SKellogg@Geosyntec.com>; Jessica Yeager <JYeager@Geosyntec.com>
Subject: Rolling Knolls - Appendix B to the Feasibility Study Report

Hi Betsy, I'm following up on our discussion on August 21 about USEPA comments on Appendix B to the Rolling Knolls FS Report. We provide the following discussion and proposed alternative language .

1. In the proposed edits to the introduction and conclusions, USEPA has proposed language that could be misunderstood to require active remediation of all soil with constituent levels above the Alternative Remediation Standards (ARSs). As you know, the remedial alternatives in the draft FS only include active remediation (capping or excavation) of soil with constituent levels more than three times the ARSs. This is a substantial difference in the extent of remediation and is not consistent with the intent of the FS. Our changes do not change the extent of remediation required, but rather are meant to clarify the various components of the remedial alternatives 3 and 4.

We proposed to omit references to remediating the ARSs, as follows:

USEPA language	Proposed language
Appendix B presents an approach for determining, and an evaluation of, the areal extent of remedial measures needed to address elevated human health risks calculated in the Baseline Human Health Risk Assessment (BHHRA) for the Rolling Knolls Landfill site. This	Appendix B presents an approach for determining, and an evaluation of, the areal extent of remedial measures needed to address elevated human health risks calculated in the Baseline Human Health Risk Assessment (BHHRA) for the Rolling Knolls Landfill site. This

evaluation is based solely on the BHHRA and does not take into account the risk-based Alternative Remediation Standards (ARSs) presented in Appendix A. Additional actions, beyond those described in this appendix, are needed to address elevated risks associated with portions of the site with concentrations that exceed the ARS values, as necessary. These additional actions are described in the main text of the Feasibility Study report.	evaluation is based solely on the BHHRA and does not take into account the Alternative Remediation Standards (ARSs) presented in Appendix A. Any additional remedial actions, beyond those described in this appendix, are described in the main text of the FS report.
Remediating the Selected Area addresses the elevated human health risks as calculated in the site-specific BHHRA. As mentioned previously, additional actions will be needed to address risks associated with exceedances of the ARS values presented in Appendix A. These additional actions are discussed in Section 5 of the Feasibility Study report. Note that the ARS for PCBs is 5 mg/kg, and the EPC for PCBs outside of the Selected Area calculated in this appendix is 3.5 mg/kg, below the relevant ARS.	Remediating the Selected Area addresses the elevated human health risks as calculated in the site-specific BHHRA. Any additional remedial actions are described in Section 5 of the Feasibility Study report. Note that the ARS for PCBs is 5 mg/kg, and the EPC for PCBs outside of the Selected Area calculated in this appendix is 3.5 mg/kg, below the relevant ARS.

2. In your comment on page 3 of Appendix B, USEPA requests deleting the following paragraph, at least in part because it refers to the ARS. However, the point of the paragraph is to illustrate that the definition of the Selected Area is conservative, as indicated by the difference between the EPC for the Selected Area (3.5 mg/kg) compared to the RBC (29 mg/kg). This is a useful comparison to a reviewer of Appendix B. Therefore, we propose to leave the paragraph in, but remove the reference to the ARS, as follows:

USEPA Language	Proposed Language
Because, as described below, the EPC calculated for PCBs in readily accessible (within two feet of the ground surface) soil outside the 25-acre Selected Area (3.5 mg/kg) is significantly lower than the calculated RBC (29 mg/kg) and below the applicable ARS (5 mg/kg), the Selected Area is conservative in its size and location.	Because, as described below, the EPC calculated for PCBs in readily accessible (within two feet of the ground surface) soil outside the 25-acre Selected Area (3.5 mg/kg) is significantly lower than the calculated RBC (29 mg/kg), the Selected Area is conservative in its size and location.
We added the relevant parts of this language to the conclusion. This paragraph on Page 3 is not necessary and should be deleted.	

Please let us know if you have any questions.

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